

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KATRINA DOUGLAS,

Plaintiff,

v.

CERTEGY PAYMENT RECOVERY
SERVICES, INC.,

Defendant.

Case No.: 1:07-cv-6773

Judge: Bucklo

Magistrate Judge: Valdez

**PLAINTIFF'S MOTION TO DISMISS
WITH PREJUDICE**

Now comes the Plaintiff, by and through counsel, pursuant to Fed. R. Civ. P. 41(a)(2), and respectfully requests the Court to dismiss the above-captioned action with prejudice.

On February 28, 2008, Defendant took Plaintiff's deposition. During Plaintiff's deposition, facts previously unknown to both Defendant and Plaintiff surfaced that undermine the allegations Plaintiff alleged in her Complaint. Plaintiff attempted to obtain Defendant's consent to the dismissal of this action but Defendant refused. Based on those facts, Plaintiff now moves the Court to dismiss the above-captioned action with prejudice.

RESPECTFULLY SUBMITTED,

Legal Helpers, P.C.

By: /s/ Richard J. Meier
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CERTIFICATE OF SERVICE

I hereby certify that on February 29, 2008 a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Richard J. Meier